Federal Operating Permit
Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Facility Name:	Siegwerk, Inc.
Facility Location:	4225 Murray Place Lynchburg, VA 24501
Registration Number:	30595
Permit Number:	SCRO30595

Permit Number	Effective Date	Expiration Date
SCRO-30260	May 3, 2004	May 2, 2009

Modification date: January 5, 2007

_____
Director, Department of Environmental Quality

January 5, 2007
Signature Date

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I. Facility Information

Permittee
Siegwerk, Inc.
P.O. Box 10064
Lynchburg, VA 24506

Responsible Official
Juergen Roth
Executive Vice President

Facility
Siegwerk, Inc.
4225 Murray Place
Lynchburg, VA 24501

Contact Person
Juergen Roth
Executive Vice President
(434) 847-9033

County-Plant Identification Number: 51-680-00123

Facility Description: NAICS 325910 – Siegwerk is a rotogravure ink manufacturing facility. Main operations consist of batch-only production of rotogravure inks and varnishes. Equipment and operations responsible for emissions are solvent storage tanks, ink storage tanks, mixing tanks, ink transfer, and solvent transfer. Ingredients are stored, mixed, dissolved, filtered, and delivered by pipeline, tanker, tote, or drum. Toluene is the main solvent used in the manufacture of these inks. Xylene is also present in the inks.

Siegwerk is also permitted to operate a soil vapor extraction and ground water recovery system at this facility.

II. Emission Units

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment							
B#1	001	Burnham, Model V1111 - 7/2003	2.656 MMBtu/hr	-	-	-	-
B#2	001	Burnham, Model V1111 - 7/2003	2.656 MMBtu/hr	-	-	-	-
Storage Tanks							
TF1A	TF1A	Solvent 3600 V Storage - 1987	25,098 gallons	-	-	-	-
TF2A	TF2A	Solvent 3600 V Storage - 1987	25,098 gallons	-	-	-	-
Tank 69A	Tank 69A	Quad Black Ink Storage - 1992	4,018 gallons	-	-	-	July 22, 1991
Tank 69B	Tank 69B	Quad Black Ink Storage - 1992	4,018 gallons	-	-	-	July 22, 1991
Tank 69C	Tank 69C	Quad Black Ink Storage - 1992	7,825 gallons	-	-	-	July 22, 1991
Tank 69D	Tank 69D	Quad Black Ink Storage - 1992	7,825 gallons	-	-	-	July 22, 1991
Tank 70A	Tank 70A	Quad Barium Ink Storage - 1992	5,922 gallons	-	-	-	July 22, 1991

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Tank 70B	Tank 70B	Quad Rubine Ink Storage - 1992	5,922 gallons	-	-	-	July 22, 1991
Tank 70C	Tank 70C	Quad Blue Ink Storage - 1992	5,922 gallons	-	-	-	July 22, 1991
Tank 70D	Tank 70D	Quad Blue Ink Storage - 1992	5,922 gallons	-	-	-	July 22, 1991
Tank 71B	Tank 71B	Quad Black Ink Storage - 1992	9,835 gallons	-	-	-	July 22, 1991
Tank 71C	Tank 71C	Extender Storage 03015 - 1992	9,835 gallons	-	-	-	July 22, 1991
Tank 75	Tank 75	Resin 2742 Storage - 1995	20,080 gallons	-	-	-	-
LR1	LR1	Loading Rack - 1977	150 gpm	-	-	-	-
LR2	LR2	Loading Rack - 1992	150 gpm	-	-	-	July 22, 1991
Remediation Equipment							
S1,S2	S1	Soil Vapor Extraction and Groundwater Recovery Systems - 2003	200 acfm	Thermal Catalytic Oxidizer	CS1	VOC	February 5, 2003

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

III. Fuel Burning Equipment Requirements – Boilers (Ref. Nos. B#1 and B#2)

A. Limitations for Boilers (Ref. Nos. B#1 and B#2)

Emissions from the operation of the boilers shall not exceed the limits specified below:

Total Suspended Particulate	0.6 lb/MMBtu (each boiler)
Sulfur Dioxide	14.02 lbs/hr (total)

(9 VAC 5-80-110, 9 VAC 5-40-900, and 9 VAC 5-40-930)

B. Monitoring for Boilers (Ref. Nos. B#1 and B#2)

At least one time per calendar week an observation of the presence of visible emissions from the boilers' common stack (Ref. No. 001) shall be made. The presence of visible emissions shall require the permittee to:

1. take timely corrective action such that the boilers' stack (Ref. No. 001) resumes operation with no visible emissions, or,

2. conduct a visible emission evaluation (VEE) on the boilers' stack (Ref. No. 001), in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six (6) minutes, to assure visible emissions from the stack are 20 percent opacity or less. If any of the observations exceed the opacity limitation of 20 percent, the observation period shall continue until a total of sixty (60) minutes of observation have been completed. Timely corrective action shall be taken, if necessary, such that the fuel burning equipment resumes operation within the 20 percent opacity limit.

The permittee shall maintain a stack observation log to demonstrate compliance. The log shall include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, any necessary corrective action, and the name of the observer. If the fuel burning equipment has not been operated during the week, it shall be noted in the log book that the equipment was not operated.
(9 VAC 5-80-110 E and 9 VAC 5-80-110 K)

C. Recordkeeping for Boilers (Ref. Nos. B#1 and B#2)

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the South Central Regional Office. These records shall include, but are not limited to:

1. The origin and value of all emission factors for all pollutants relied upon for purposes of calculating actual emission rates and the equations used in these calculations.

2. Results of weekly opacity observations, along with details regarding any necessary corrective actions.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.
(9 VAC 5-80-110)

D. Testing for Boilers (Ref. Nos. B#1 and B#2)

The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
(9 VAC 5-40-30 and 9 VAC 5-80-110)

IV. Process Equipment Requirements – Storage Tanks (Ref. Nos. Tank 69A, Tank 69B, Tank 69C, Tank 69D, Tank 70A, Tank 70B, Tank 70C, Tank 70D, Tank 71A, Tank 71B, and Tank 71C) and Loading Rack (Ref. No. LR2)

A. Limitations for Storage Tanks (Ref. Nos. Tank 69A, Tank 69B, Tank 69C, Tank 69D, Tank 70A, Tank 70B, Tank 70C, Tank 70D, Tank 71B, and Tank 71C) and Loading Rack (Ref. No. LR2)

1. The annual throughput of ink for these tanks and the loading rack shall not exceed 6,100,000 gallons, calculated monthly as the sum of each consecutive twelve (12) month period.
(9 VAC 5-80-110 and Condition 3 of 7/22/91 Permit)

2. Emissions from the operation of the storage tanks and loading rack shall not exceed the limits specified below:

Volatile Organic Compounds	14.1 lbs/hr	24.2 lbs/day	3.3 tons/yr

(9 VAC 5-80-110 and Condition 4 of 7/22/91 Permit)

B. Recordkeeping

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the South Central Regional Office. These records shall include, but are not limited to:

1. Annual throughput of ink, calculated monthly as the sum of each consecutive twelve (12) month period.

2. The origin and value of all emission factors for all pollutants relied upon for purposes of calculating actual emission rates and the equations used in these calculations.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.
(9 VAC 5-50-50, 9 VAC 5-80-110, and Condition 6 of 7/22/91 Permit)

V. Process Equipment Requirements – Storage Tanks (Ref. Nos. TF1A, TF2A, and Tank 75)

Recordkeeping for Storage Tanks (TF1A, TF2A, and Tank 75)

The permittee shall keep readily accessible records for Storage Tanks (TF1A, TF2A, and Tank 75) showing the dimensions of each storage vessel and an analysis for each tank showing the capacity of the vessel. These records shall be kept for the life of each source. The permittee shall also keep records available for the most recent five (5) years of the origin and value of all emission factors for all pollutants relied upon for purposes of calculating actual emission rates and the equations used in these calculations.
(9 VAC 5-80-110 and 40 CFR 60.116b(a) and (b))

VI. Process Equipment Requirements – Loading Rack (Ref. No. LR1)

Recordkeeping for Loading Rack (LR1)

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the South Central Regional Office. These records shall include, but are not limited to the origin and value of all emission factors for all pollutants relied upon for purposes of calculating actual emission rates and the equations used in these calculations. These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.
(9 VAC 5-80-110)

VII. Process Equipment Requirements – Soil Vapor Extraction and Groundwater Recovery Systems (Ref. Nos. S1 and S2)

A. Limitations for Soil Vapor Extraction and Groundwater Recovery Systems (Ref. Nos. S1 and S2)

1. VOC emissions from the soil vapor and groundwater recovery systems shall be controlled by a thermal catalytic oxidizer with recuperative heat recovery. The thermal catalytic oxidizer shall be provided with adequate access for inspection and shall be in operation when the soil vapor extraction and groundwater recovery systems are operating.
   (9 VAC 5-80-110 and Condition 3 of 2/5/03 Permit)

2. The thermal catalytic oxidizer shall maintain a control efficiency for VOC of no less than 95 percent on a mass basis.
   (9 VAC 5-80-110 and Condition 4 of 2/5/03 Permit)

3. The catalytic oxidizer shall maintain a minimum oxidizer inlet temperature of 600EF.
   (9 VAC 5-80-110 and Condition 5 of 2/5/03 Permit)

4. Visible emissions from the thermal catalytic oxidizer shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.
   (9 VAC 5-80-110 and Condition 10 of 2/5/03 Permit)

5. Emissions from the operation of the soil vapor extraction and groundwater recovery system shall not exceed the limits specified below:

Volatile Organic Compounds	0.7 lbs/hr	2.2 tons/yr

   (9 VAC 5-80-110 and Condition 9 of 2/5/03 Permit)

B. Monitoring for Soil Vapor Extraction and Groundwater Recovery Systems (Ref. Nos. S1 and S2)

1. Activity tests shall be conducted on the catalyst for activity level in percent of VOC destruction. The initial test shall be conducted after one (1) year's operation, but no later than 15 months after startup. After the initial test, the tests shall be conducted on an annual basis. The details of the tests are to be arranged with the South Central Regional Office. Two written copies of the test results shall be submitted to the South Central Regional Office within 45 days after test completion.
   (9 VAC 5-80-110 and Condition 6 of 2/5/03 Permit)

2. The thermal catalytic oxidizer shall be equipped with devices to continuously measure catalytic oxidizer gas temperature both immediately upstream and downstream of the catalyst bed. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the soil vapor extraction and groundwater recovery systems are operating.
   (9 VAC 5-80-110 and Condition 7 of 2/5/03 Permit)

3. The temperature monitoring devices used to continuously measure temperature shall be observed by the permittee with a frequency of not less than once per day. The permittee shall keep a log of the observations from the temperature monitoring devices.

   (9 VAC 5-80-110 and Condition 8 of 2/5/03 Permit)

4. At least one time per calendar week an observation of the presence of visible emissions from the soil vapor and groundwater recovery systems' stack (Ref. No. S1) shall be made. The presence of visible emissions shall require the permittee to:

   a. take timely corrective action such that the soil vapor and groundwater recovery systems' stack (Ref. No. S1) resumes operation with no visible emissions, or,

   b. conduct a visible emission evaluation (VEE) on the soil vapor and groundwater recovery systems' stack (Ref. No. S1), in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six (6) minutes, to assure visible emissions from the stack are 5 percent opacity or less. If any of the observations exceed the opacity limitation of 5 percent, the observation period shall continue until a total of sixty (60) minutes of observation have been completed. Timely corrective action shall be taken, if necessary, such that the fuel burning equipment resumes operation within the 5 percent opacity limit.

   The permittee shall maintain a stack observation log to demonstrate compliance. The log shall include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, any necessary corrective action, and the name of the observer. If the equipment has not been operated during the week, it shall be noted in the log book that the equipment was not operated.
   (9 VAC 5-80-110 E and 9 VAC 5-80-110 K)

C. Recordkeeping

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the South Central Office Regional Director. These records shall include, but are not limited to:

1. Annual hours of operation of soil vapor extraction and groundwater recovery system, calculated monthly as the sum of each consecutive 12 month period.

2. Operation and control device monitoring records for the catalytic oxidizer.

3. The origin and value of all emission factors for all pollutants relied upon for purposes of calculating actual emission rates and the equations used in these calculations.

4. Results of weekly opacity observations, along with details regarding any necessary corrective actions.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.
(9 VAC 5-80-110 and Condition 11 of 2/5/03 Permit)

D. Testing

The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
(9 VAC 5-50-30 and 9 VAC 5-80-110)

VIII. MACT Requirements - Subpart GGGGG - National Emission Standards for Hazardous Air Pollutants: Site Remediation

1. Except where this permit is more restrictive, the soil vapor extraction and ground water recovery system shall comply with the Federal requirements of 40 CFR Part 63 Subpart GGGGG National Emissions Standards for Hazardous Air Pollutants: Site Remediation.
   (9 VAC 5-80-110 and 40 CFR 63 Subpart GGGGG)

2. Except where this permit is more restrictive, the soil vapor extraction and ground water recovery system shall comply with the limitations and work practice standards requirements for closed vent systems and control devices per 40 CFR Part 63 Subpart GGGGG National Emissions Standards for Hazardous Air Pollutants: Site Remediation.
   (9 VAC 5-80-110 and 40 CFR 63 Subpart GGGGG)

3. Except where this permit is more restrictive, the permittee shall meet all inspection and monitoring requirements of 40 CFR 63 Subpart GGGGG applicable to the soil vapor extraction and ground water recovery system. The monitors shall be maintained and operated in accordance with 40 CFR 63 Subpart GGGGG.
   (9 VAC 5-80-110 and 40 CFR 63 Subpart GGGGG)

4. Except where this permit is more restrictive, the permittee in accordance with 40 CFR 63 Subpart GGGGG and Subpart A, shall record and retain all information necessary to determine that the operation of the soil vapor extraction and ground water recovery system is in compliance with the 40 CFR 63 Subpart GGGGG.
   (9 VAC 5-80-110 and 40 CFR 63 Subpart GGGGG)

5. Except where this permit is more restrictive, the permittee in accordance with 40 CFR 63 Subpart GGGGG and Subpart A, shall meet all applicable reporting requirements for the soil vapor extraction and ground water recovery system.
   (9 VAC 5-80-110 and 40 CFR 63 Subpart GGGGG)

6. The permittee shall conduct all testing required in 40 CFR 63 Subpart GGGGG.
   (9 VAC 5-80-110 and 40 CFR 63 Subpart GGGGG)

IX. Facility Wide Conditions

A. Limitations

1. Unless otherwise specified in this permit, for an existing emission unit at the facility, visible emissions shall not exceed 20 percent opacity, except during one six-minute period in any one hour in which visible emissions shall not exceed 60 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).

   (9 VAC 5-40-80 and 9 VAC 5-80-110)

2. Unless otherwise specified in this permit, for a new emission unit at the facility, visible emissions shall not exceed 20 percent opacity, except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.

   (9 VAC 5-50-80 and 9 VAC 5-80-110)

3. Volatile organic compounds shall not be intentionally spilled, discarded to sewers, stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution control practices for minimizing emissions.

   (9 VAC 5-40-20 F and 9 VAC 5-50-20 F)

B. Recordkeeping

The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the South Central Regional Office. These records shall include, but are not limited to:

a. Annual production of ink, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

b. Annual emissions of individual HAPs calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

c. Results of all inspections required by the fugitive Leak Detection and Repair Program, including at least unit No., unit type, service type, date of inspection, results, and inspector.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.
(9 VAC 5-80-110 and Condition 6 of the 10/31/2006 Permit)

X. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation (9 VAC_)	Pollutant Emitted	Rated Capacity
Tank 7	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 8	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 9	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 14	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 15	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 23	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 24	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 25	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 43	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 44	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 45	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 52	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 53	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tf6B	Storage Tank	5-80-720 B.2.	VOC (toluene)	5005 gals.
Tank 10	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 11	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 12	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 13	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 21	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 22	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tf6C	Storage Tank	5-80-720 B.2.	VOC (toluene)	5005 gals.
Silo 1	Silo	5-80-720 B.1.	Particulate	7500 lbs.
Silo 2	Silo	5-80-720 B.1.	Particulate	7500 lbs.

Emission Unit No.	Emission Unit Description	Citation (9 VAC_)	Pollutant Emitted	Rated Capacity
Silo 3	Silo	5-80-720 B.1.	Particulate	7500 lbs.
Tf6D	Storage Tank	5-80-720 B.2.	VOC (toluene)	10011 gals.
54	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 26	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 40	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 41	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tf4B	Storage Tank	5-80-720 B.2.	VOC (toluene)	10011 gals.
Tf6A	Storage Tank	5-80-720 B.2.	VOC (toluene)	5005 gals.
Tank 71A	Storage Tank	5-80-720 B.2.	VOC	3983 gals.
DT/Y1	Storage Tank	5-80-720 B.2.	VOC (toluene)	729 gals.
DT/Y2	Storage Tank	5-80-720 B.2.	VOC (toluene)	724 gals.
DT/R1	Storage Tank	5-80-720 B.2.	VOC (toluene)	569 gals.
DT/R2	Storage Tank	5-80-720 B.2.	VOC (toluene)	724 gals.
DT/R3	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
DT/B1	Storage Tank	5-80-720 B.2.	VOC (toluene)	724 gals.
DT/B3	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
DT/K1	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
DT/K2	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
DT/K4	Storage Tank	5-80-720 B.2.	VOC (toluene)	795 gals.
M-Y1	Mixer	5-80-720 B.2.	VOC (toluene)	900 liters
M-Y2	Mixer	5-80-720 B.2.	VOC (toluene)	1500 liters
M-R1	Mixer	5-80-720 B.2.	VOC (toluene)	1500 liters
M-R2	Mixer	5-80-720 B.2.	VOC (toluene)	1500 liters
M-R3	Mixer	5-80-720 B.2.	VOC (toluene)	450 liters
M-B1	Mixer	5-80-720 B.2.	VOC (toluene)	900 liters

Emission Unit No.	Emission Unit Description	Citation (9 VAC_)	Pollutant Emitted	Rated Capacity
M-B3	Mixer	5-80-720 B.2.	VOC (toluene)	900 liters
M-K1	Mixer	5-80-720 B.2.	VOC (toluene)	900 liters
M-K4	Mixer	5-80-720 B.2.	VOC (toluene)	1500 liters
Tank 19	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 20	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 48	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 34	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 35	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 74	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 28	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 49	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 36	Storage Tank	5-80-720 B.2.	VOC (toluene)	2414 gals.
Tank 42	Storage Tank	5-80-720 B.2.	VOC (toluene)	1122 gals.
Tank 2	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 3	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 5	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 6	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 1	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 4	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
D8/Y	Dissolver	5-80-720 B.2.	VOC (toluene)	1715 gals.
D11/Y	Dissolver	5-80-720 B.2.	VOC (toluene)	1966 gals.
D1/R3	Dissolver	5-80-720 B.2.	VOC (toluene)	840 gals.
D9/R	Dissolver	5-80-720 B.2.	VOC (toluene)	2828 gals.
D10/R	Dissolver	5-80-720 B.2.	VOC (toluene)	1715 gals.
D6/B	Dissolver	5-80-720 B.2.	VOC (toluene)	1726 gals.
D7/B	Dissolver	5-80-720 B.2.	VOC (toluene)	1920 gals.

Emission Unit No.	Emission Unit Description	Citation (9 VAC_)	Pollutant Emitted	Rated Capacity
D2/B2	Dissolver	5-80-720 B.2.	VOC (toluene)	840 gals.
D3-1H	Dissolver	5-80-720 B.2.	VOC (toluene)	771 gals.
D4-1H	Dissolver	5-80-720 B.2.	VOC (toluene)	647 gals.
D1/K1	Dissolver	5-80-720 B.2.	VOC (toluene)	1266 gals.
D1/K2	Dissolver	5-80-720 B.2.	VOC (toluene)	840 gals.
D12/K4	Dissolver	5-80-720 B.2.	VOC (toluene)	1851 gals.
D1	Dissolver	5-80-720 B.2.	VOC (toluene)	1472 gals.
D2	Dissolver	5-80-720 B.2.	VOC (toluene)	1472 gals.
D3	Dissolver	5-80-720 B.2.	VOC (toluene)	1698 gals.
D4	Dissolver	5-80-720 B.2.	VOC (toluene)	1801 gals.
D5	Dissolver	5-80-720 B.2.	VOC (toluene)	757 gals.
D6A	Dissolver	5-80-720 B.2.	VOC (toluene)	1228 gals.
D6B	Dissolver	5-80-720 B.2.	VOC (toluene)	1228 gals.
D1/F6	Dissolver	5-80-720 B.2.	VOC (toluene)	1238 gals.
D2/F6	Dissolver	5-80-720 B.2.	VOC (toluene)	1415 gals.
D1A	Dissolver	5-80-720 B.2.	VOC (toluene)	515 gals.
D1B	Dissolver	5-80-720 B.2.	VOC (toluene)	515 gals.
Tank 16	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 27	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 30	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 31	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 37a	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 37b	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 46	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 17	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.

Emission Unit No.	Emission Unit Description	Citation (9 VAC_)	Pollutant Emitted	Rated Capacity
Tank 18	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 47	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 32	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 33	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 29	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 73	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 38	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 39	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 50	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 51	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 72	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
TF3A	Storage Tank	5-80-720 B.2.	VOC (toluene)	12,549 gals.
TF3B	Storage Tank	5-80-720 B.2.	VOC (toluene)	12,549 gals.
TF4A	Storage Tank	5-80-720 B.2.	VOC (toluene)	15,017 gals.
TF5A	Storage Tank	5-80-720 B.2.	VOC (toluene)	12,549 gals.
TF5B	Storage Tank	5-80-720 B.2.	VOC (toluene)	12,549 gals.
TF7A	Storage Tank	5-80-720 B.2.	VOC (toluene)	12,549 gals.
TF7B	Storage Tank	5-80-720 B.2.	VOC (toluene)	12,549 gals.
TF8A	Storage Tank	5-80-720 B.2.	VOC (toluene)	12,549 gals.
TF8B	Storage Tank	5-80-720 B.2.	VOC (toluene)	12,549 gals.

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

XI. General Conditions

A. Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.
(9 VAC 5-80-110 N)

B. Permit Expiration

This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.

1. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.

2. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.

3. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.

4. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.

5. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9 VAC 5-80-80 B, C and F, 9 VAC 5-80-110 D, and 9 VAC 5-80-170 B)

C. Recordkeeping and Reporting

1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:

   a. The date, place as defined in the permit, and time of sampling or measurements.

   b. The date(s) analyses were performed.

   c. The company or entity that performed the analyses.

   d. The analytical techniques or methods used.

   e. The results of such analyses.

   f. The operating conditions existing at the time of sampling or measurement.

   (9 VAC 5-80-110 F)

2. Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
   (9 VAC 5-80-110 F)

3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than **March 1** and **September 1** of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

   a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.

   b. All deviations from permit requirements. For purposes of this permit, deviations include, but are not limited to:

      (1) Exceedance of emissions limitations or operational restrictions;

      (2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,

      (3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.

c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

(9 VAC 5-80-110 F)

D. Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than **March 1** each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

1. The time period included in the certification. The time period to be addressed is January 1 to December 31.

2. The identification of each term or condition of the permit that is the basis of the certification.

3. The compliance status.

4. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.

5. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.

6. Such other facts as the permit may require to determine the compliance status of the source.

One copy of the annual compliance certification shall be sent to EPA at the following address:

Clean Air Act Title V Compliance Certification (3AP00)
U. S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029.

(9 VAC 5-80-110 K.5)

E. Permit Deviation Reporting

The permittee shall notify the Director, South Central Region within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition IX.C.3. of this permit.
(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

F. Failure/Malfunction Reporting

In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after the malfunction is discovered, notify the Director, South Central Region by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, South Central Region.
(9 VAC 5-20-180 C)

G. Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.
(9 VAC 5-80-110 G.1)

H. Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.
(9 VAC 5-80-110 G.2)

I. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
(9 VAC 5-80-110 G.3)

J. Permit Modification

A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1790, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios. (9 VAC 5-80-190 and 9 VAC 5-80-260)

K. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. (9 VAC 5-80-110 G.5)

L. Duty to Submit Information

1. The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.
(9 VAC 5-80-110 G.6)

2. Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.
(9 VAC 5-80-110 K.1)

M. Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by April 15 of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department.
(9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

N. Fugitive Dust Emission Standards

During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;

2. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;

3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or other similar operations;

4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,

5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-40-90 and 9 VAC 5-50-90)

O. Startup, Shutdown, and Malfunction

At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
(9 VAC 5-50-20 E and 9 VAC 5-40-20 E)

P. Alternative Operating Scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1.
(9 VAC 5-80-110 J)

Q. Inspection and Entry Requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.

2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.

3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.

4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

R. Reopening For Cause

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

1. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

2. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

S. Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.
(9 VAC 5-80-150 E)

T. Transfer of Permits

1. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.
(9 VAC 5-80-160)

2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)

3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)

U. Malfunction as an Affirmative Defense

1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of paragraph 2 of this condition are met.

2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:

   a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.

   b. The permitted facility was at the time being properly operated.

   c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.

   d. The permittee notified the board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110 F 2 b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirement under 9 VAC 5-20-180 C.

   e. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.

f. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.

(9 VAC 5-80-250)

V. Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any of the grounds for revocation or termination or for any other violations of these regulations.
(9 VAC 5-80-190 C and 9 VAC 5-80-260)

W. Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.
(9 VAC 5-80-80 E)

X. Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.
(40 CFR Part 82, Subparts A-F)

Y. Asbestos Requirements

The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150).
(9 VAC 5-60-70 and 9 VAC 5-80-110 A.1)

Z. Accidental Release Prevention

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.
(40 CFR Part 68)

AA. Changes to Permits for Emissions Trading

No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.
(9 VAC 5-80-110 I)

BB. Emissions Trading

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

1. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.

2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.

3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)